

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re: ) Chapter 7  
)  
MARK F. WHITE and, ) Bankruptcy Case  
NNIKA E. WHITE, ) No. 14-36232 KRH  
)  
Debtors. )

**TRUSTEE'S MOTION FOR AUTHORITY  
TO INITIATE CHAPTER 7 FILING**

Bruce H. Matson, Trustee for the bankruptcy estate (the "Estate") of the above-referenced debtors (the "Debtors") hereby requests authority to file a chapter 7 petition in this Court to initiate a voluntary case for The Law Office of White & Associates, PLLC and, in support hereof, states as follows:

1. The Debtors filed this case as a chapter 13 proceeding on November 19, 2014.
2. On November 5, 2015, this case was converted to a chapter 7 proceeding and Bruce H. Matson was appointed as trustee (the "Trustee") in and for the case and continue to serve in that capacity.
3. Among the assets of the Estate pursuant to 11 U.S.C. §541(a) is the Debtors' interest in a professional limited liability company known as The Law Office of White & Associates, PLLC (the "PLLC").
4. The Trustee understands that the Estate owns and/or controls 100% of the interests in the PLLC.

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Bruce H. Matson (Va. Bar No. 22874)  
LeClairRyan, A Professional Corporation  
919 E. Main Street, 24<sup>th</sup> Floor  
Richmond, VA 23219  
(804) 783-2003

Trustee

5. The PLLC may have value to the Estate, however, as a result of certain developments, Ms. White may not be able to operate the PLLC. Accordingly, any value that the Estate may have in the PLLC is at risk.

6. In addition, these developments may also put existing clients of the PLLC at risk. The inability to address promptly the needs of those clients may cause additional and potentially unnecessary claims to be filed against the Estate. In addition, the Court as well as the clients and creditors will be disadvantaged unless some control and order can be brought over the PLLC and its assets.

7. Preserving the information of and the assets of the PLLC as well as limiting potential claims against the Estate is in the best interests of creditors.

8. Placing the PLLC into a chapter 7 proceeding with an independent trustee and court supervision is likely the best alternative to achieve the goal of preserving assets, protecting clients and limiting claims.

WHEREFORE, the Trustee requests the Court grant this motion to authorize the Trustee, to the extent necessary or advisable, (i) to use his ownership of the interest of the PLLC to appoint himself as the sole managing member, (ii) to execute a voluntary petition initiating a chapter 7 proceeding for the PLLC, and (iii) to grant such other and/or supplemental relief as may be appropriate.

/s/ Bruce H. Matson, Trustee

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Trustee

CERTIFICATE OF SERVICE

I hereby certify that on this 2<sup>nd</sup> day of December, 2015 a true copy of the foregoing Trustee's Motion For Authority to Initiate Chapter 7 Filing was sent electronically, via fax and/or by first class mail to:

Robert Van Arsdale  
Assistant U.S. Trustee  
Office of the U.S. Trustee  
701 East Broad Street - Suite 4304  
Richmond, Virginia 23219

Nnika E. White  
Mark F. White  
4600 Jenway Loop  
Moseley, VA 23120  
Fax (804) 377-9434  
Debtors

/s/ Bruce H. Matson  
Trustee